

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,</p> <p>Debtors.¹</p>	<p>PROMESA Title III</p> <p>Case No. 17-BK-3283-LTS</p> <p>(Jointly Administered)</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as a representative of</p> <p>PUERTO RICO ELECTRIC POWER AUTHORITY,</p> <p>Debtor.</p>	<p>PROMESA Title III</p> <p>Case No. 17-BK-4780-LTS</p>
<p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>Plaintiff</p> <p>v.</p> <p>HON. PEDRO PIERLUISI, in his official capacity as Governor of Puerto Rico,</p>	<p>Adv. Proc. No. 24-00062-LTS</p>

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Defendant

and

SENATE OF PUERTO RICO, through Hon. José Luis Dalmau, in his official capacity as President of the Senate of Puerto Rico,

Intervenor – Defendant

THE GOVERNOR’S MOTION FOR (I) LEAVE TO SUBMIT EXHIBITS IN THE SPANISH LANGUAGE AND (II) EXTENSION OF TIME TO SUBMIT CERTIFIED TRANSLATIONS

To the Honorable United States District Judge Laura Taylor Swain and the Honorable Magistrate Judge Judith Gail Dein:²

Governor Pedro R. Pierluisi, acting in his official capacity, through the undersigned attorneys, respectfully states as follows:

1. Today, the Governor filed the *Governor's Opposition to Financial Oversight and Management Board for Puerto Rico's Motion for Summary Judgment Pursuant to Bankruptcy Rule 7056 and Request for Relief Under Rule 56(d)* (the "Opposition") (ECF No. 67.)

2. In support of the arguments included in the Opposition, the Governor included two exhibits in its original Spanish language: (i) the June 24, 2023 Revised Draft of Senate Bill 1064, and (ii) an excerpt from the Single Legislative Procedure System for Puerto Rico's website describing the legislative history of Act 10-2024, attached as Exhibits 6 and 7, respectively, to *Declaration of Mohammad Saleh Yassin, Esq. in Opposition to Financial Oversight and Management Board for Puerto Rico's Motion for Summary Judgment Under Bankruptcy Rule 7056 and in Support of Governor Pierluisi's Request for Relief Under Rule 56(d)* (the "Documents"). Nevertheless, due to time constraints, the Governor was unable to obtain the certified English translation of the Documents.

3. As a result of the above, the Governor seeks leave from this Court to submit the Documents and requests an extension of seven (7) days to file the certified English translations of the Documents under Local District Court Rule 5(c).

4. The Governor has tried diligently to obtain a certified translation of these

² All capitalized terms used herein have the meanings set forth and defined in *The Governor's Opposition to Financial Oversight and Management Board for Puerto Rico's Motion for Summary Judgment Pursuant to Bankruptcy Rule 7056 and Request for Relief Under Rule 56(d)*. Unless otherwise specified, all emphasis is added and all quotation marks and citations are omitted. Page numbers in citations to ECF documents refer to the page numbers in the original document, if any, or, if not available, to the page numbers in the ECF header.

documents. Nevertheless, due to the expedited nature of the proceedings, there has not been sufficient time to obtain them. The Governor is in the process of doing so.

5. Accordingly, the Governor respectfully requests that the Court enter an order substantially in the form attached hereto as Exhibit 1 granting the Governor until October 30, 2024 to submit the certified translations of the Documents.

WHEREFORE, the Governor respectfully request this Honorable Court enter the proposed order attached as Exhibit 1 hereto and grant such other relief as is just and proper.

Dated: October 23, 2024
San Juan, Puerto Rico

Respectfully,

O'MELVENY & MYERS LLP

/s/ William J. Sushon

John J. Rapisardi
William J. Sushon
(Admitted *Pro Hac Vice*)
1301 Avenue of the Americas,
17th Floor,
New York, NY 10019
Telephone: (212) 326-2000
Facsimile: (212) 326-2061
Email: jrapisardi@omm.com
wsushon@omm.com

-and-

Peter Friedman
1625 Eye Street, NW
Washington, DC 20006
Telephone: (202) 383-5300
Facsimile: (202) 383-5414
Email: pfriedman@omm.com

Attorneys for Governor Pedro R. Pierluisi

MARINI PIETRANTONI MUÑOZ LLC

/s/ Luis C. Marini-Biaggi

Luis C. Marini-Biaggi
USDC No. 222301
Carolina Velaz-Rivero
USDC No. 300913
Ignacio J. Labarca-Morales
USDC No. 303307
250 Ponce de León Ave., Suite 900
San Juan, Puerto Rico 00918
Telephone: (787) 705-2171
Facsimile: (787) 936-7494
Email: lmarini@mpmlawpr.com
cvelaz@mpmlawpr.com
ilabarca@mpmlawpr.com

Attorneys for Governor Pedro R. Pierluisi